

**To:** Shari Yeatts[syeatts@hickmanseggs.com]  
**Cc:** Billy G. Hickman[bghickman@hickmanseggs.com]; Glenn Hickman[ghickman@hickmanseggs.com]; Robert Phalen[rphalen@hickmanseggs.com]; Paul Yeatts[pyeatts@hickmanseggs.com]  
**From:** Chan, Janice  
**Sent:** Tue 4/26/2016 4:02:51 PM  
**Subject:** RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

Permits are generally not CBI, as they are available to the general public upon request. If there are portions of the permits which Hickman would like to claim as CBI because they contain information that would likely result in substantial harmful effects on the business' competitive position, then you may make the CBI claim. If you make such a claim, then please let us know what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects. EPA's general CBI regulations are found at 40 C.F.R. Part 2, Subpart B.

Thanks,

Janice

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]  
**Sent:** Tuesday, April 26, 2016 8:46 AM  
**To:** Chan, Janice <Chan.Janice@epa.gov>; Shari Yeatts <syeatts@hickmanseggs.com>  
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>  
**Subject:** RE: Hickman's Egg Ranch Request

Hi, none that have been submitted thus far, the permits may be claimed, I'll let you know.

Shari

623-692-8451

----- Original message -----

From: "Chan, Janice" <Chan.Janice@epa.gov>  
Date: 04/26/2016 8:40 AM (GMT-07:00)  
To: Shari Yeatts <syatts@hickmanseggs.com>  
Cc: "Billy G. Hickman" <bghickman@hickmanseggs.com>, Glenn Hickman <ghickman@hickmanseggs.com>, Robert Phalen <rphalen@hickmanseggs.com>, Paul Yeatts <pyatts@hickmanseggs.com>  
Subject: RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

Are any of the submitted documents claimed as CBI? If so, can you please identify them?

Thanks,

Janice

**From:** Shari Yeatts [mailto:syatts@hickmanseggs.com]  
**Sent:** Monday, April 25, 2016 5:57 PM  
**To:** Chan, Janice <Chan.Janice@epa.gov>; Shari Yeatts <syatts@hickmanseggs.com>  
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyatts@hickmanseggs.com>  
**Subject:** RE: Hickman's Egg Ranch Request

Hi,

I will get them scanned and emailed tomorrow morning.

Thank you,

Shari

623-692-8451

----- Original message -----

From: "Chan, Janice" <Chan.Janice@epa.gov>

Date: 04/25/2016 5:53 PM (GMT-07:00)

To: Shari Yeatts <syatts@hickmanseggs.com>

Cc: "Billy G. Hickman" <bghickman@hickmanseggs.com>, Glenn Hickman <ghickman@hickmanseggs.com>, Robert Phalen <rphalen@hickmanseggs.com>, Paul Yeatts <pyatts@hickmanseggs.com>

Subject: RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

I would still like to have a conference call. If it takes much longer than Tuesday afternoon to get the additional documents to me so that I can review them on time for our call on Wednesday morning, then I may want to reschedule to another time. Let's keep it at the currently scheduled time.

Regarding questions about the NAICS code and multi-establishment facility, based on our review of the documents including the value added of the products and our discussion of the processes, we can determine whether the Tonopah and Arlington facilities are multi-establishment facilities.

Regarding the permits, please send me copies of ALL the local, state, and federal permits which Hickman currently has for each facility. If there is a logistical reason (i.e., time, number of pages, etc.) for not providing the permits at this time, please let me know.

If you have any further questions, please let me know.

Thank you,

Janice

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Janice Chan

U.S. EPA - R9

Enforcement Division

Air & TRI Section (ENF-2-1)

415-972-3308

[Chan.Janice@epa.gov](mailto:Chan.Janice@epa.gov)

**From:** Shari Yeatts [<mailto:syeatts@hickmanseggs.com>]

**Sent:** Saturday, April 23, 2016 8:57 AM

**To:** Chan, Janice <[Chan.Janice@epa.gov](mailto:Chan.Janice@epa.gov)>

**Cc:** Billy G. Hickman <[bghickman@hickmanseggs.com](mailto:bghickman@hickmanseggs.com)>; Glenn Hickman <[ghickman@hickmanseggs.com](mailto:ghickman@hickmanseggs.com)>; Robert Phalen <[rphalen@hickmanseggs.com](mailto:rphalen@hickmanseggs.com)>; Paul Yeatts <[pyeatts@hickmanseggs.com](mailto:pyeatts@hickmanseggs.com)>

**Subject:** Hickman's Egg Ranch Request

**Importance:** High

Hello Janice,

I am attaching the following documents for your review. Please let me know on Monday if you feel that a conference call on Wednesday will still be beneficial to answer any additional questions that you may have. If so, I will be happy to send a calendar invitation with a dial in code.

- Operating flow diagrams for each of our Arlington and Tonopah Facilities
- Food Systems Environmental Sustainability Plan
- SDS List for Every Facility at Arlington and Tonopah (individual SDS available upon request)
- Layer House Cage System (actual # of layers on each facility)

- NAICS code - 112310

- o We have always used this code, but after looking closer at Page 2 on the “Instructions for Applicability for Multi-facility” you sent out, we can see the possible need for Separate NACIS distinctions. The question is does our company fall under the multi-establishment classification? ***“A multi-establishment facility is a facility that consists of two or more distinct and separate economic units”***. Otherwise the code ID#: 112310 is the code we would use. We can clarify this on the conference call with you on Wednesday. I have attached a possible list of NAICS codes for review.

- Permits (list of all permits available, I can send individual permits upon request)

Please note that Hickman’s Egg Ranch does not generate any Hazardous Waste at any of our operations.

The documentation that will follow early week is:

- 2015/2016 number of workhours from employee for each facility
- Calculations of the value added of the products shipped for each facility

Have a great weekend, and we will talk more next week!

Respectfully,

**Shari Yeatts**

Hickman’s Egg Ranch -Compliance Manager

Cell Phone – 623-692-8451 – Office – 623-872-2358

